

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 11
FTX TRADING LTD., <i>et al.</i> , <sup>1</sup>	Case No. 22-11068 (JTD)
Debtors.	(Jointly Administered)
ALAMEDA RESEARCH LLC, ALAMEDA RESEARCH LTD., FTX TRADING LTD., WEST REALM SHIRES, INC., and WEST REALM SHIRES SERVICES, INC.,	Adv. Pro. No. 23-50145 (JTD)
Plaintiffs,	Re: Adv. Docket Nos. 1, 3 & 4
-against-	
FTX DIGITAL MARKETS LTD., BRIAN C. SIMMS, KEVIN G. CAMBRIDGE, and PETER GREAVES, and J. DOES 1–20	
Defendants.	

**MOTION OF FTX DIGITAL MARKETS LTD. AND THE JOINT PROVISIONAL  
LIQUIDATORS TO DISMISS THE COMPLAINT OR, IN THE ALTERNATIVE, TO  
ABSTAIN FROM RULING ON COUNTS I-IV**

FTX Digital Markets Ltd. (“**FTX Digital**”), Brian C. Simms KC, Kevin G. Cambridge, and Peter Greaves, in their capacity as the duly appointed joint provisional liquidators of FTX Digital and foreign representatives of the Provisional Liquidation of FTX Digital (the “**JPLs**” and, together with FTX Digital, the “**Defendants**”), submit this motion (the “**Motion**”) requesting that the Court (i) dismiss the entirety of the complaint [Adv. Docket No. 1] (the “**Complaint**”) filed in

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s tax identification number are 3288. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Chapter 11 Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

the above captioned adversary proceeding by Alameda Research LLC, Alameda Research Ltd., FTX Trading Limited, West Realm Shires, Inc., and West Realm Shires Services, Inc., or (ii) in the alternative, abstain from ruling on Counts I-IV of the Complaint pursuant to 28 U.S.C. § 1334(c). In support of this Motion, the Defendants rely upon the accompanying *Memorandum in Support of Motion of FTX Digital Markets Ltd. and the Joint Provisional Liquidators to Dismiss the Complaint or, in the Alternative, to Abstain from Ruling on Counts I-IV* (the “**Memorandum**”), filed contemporaneously herewith.

Pursuant to Rule 7012 and Local Rule 7012-1, the Defendants consent to the entry of a final order or judgment by the Court in connection with this Motion if it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

WHEREFORE, for the reasons set forth in the Memorandum, the Defendants respectfully request that the Court grant this Motion and enter an order substantially in the form attached hereto as **Exhibit A** dismissing the Complaint in its entirety with prejudice and granting any such other and further relief as the Court deems just and proper.

Dated: May 8, 2023  
Wilmington, Delaware

/s/ Kevin Gross

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